- 1 Court that Ms. Hill is represented by counsel. Because of
- 2 an exigency with an elderly aunt, she had requested that we
- 3 move her up in the witness list --
- 4 JUDGE STEINBERG: Well, I --
- 5 MR. KNOWLES-KELLETT: Could I just --
- 6 JUDGE STEINBERG: Could you just what?
- 7 MR. KNOWLES-KELLETT: Could I just explain for the
- 8 record what's going on?
- 9 JUDGE STEINBERG: No. It's not important.
- 10 MR. KNOWLES-KELLETT: Okay. I believe --
- JUDGE STEINBERG: Just drop it. It's not
- important. Her counsel is here or he's not here.
- MR. KNOWLES-KELLETT: Right. But --
- 14 JUDGE STEINBERG: And it's not important.
- 15 Drop it.
- Mr. Romney?
- MR. ROMNEY: Thank you, Your Honor.
- BY MR. ROMNEY:
- 19 O Ms. Hill, did your Uncle Ron refinish a table and
- 20 chair for you and your husband?
- 21 A Yes.
- 22 O Do you remember when that was, what year?
- A I believe it was 1995, the year I got married.
- Q Is it possible it was 1996?
- A No, sir. I don't think so because I believe in

- 1 1995 we got married and I believe that when we lived in our
- one bedroom apartment, which was the apartment before Gus
- 3 Thomasson, that we had that table and chair and I moved into
- 4 that apartment in September of '95. And I believe we had it
- 5 at that point.
- 6 Q If your uncle were to testify that it was in 1996,
- 7 would you disagree with him?
- 8 A Yes, I think I would. I think it was in '95.
- 9 Q Do you recall being at his house on any occasion
- and looking at the progress he was making on refinishing the
- 11 table?
- 12 A Yes. I think I do remember being there.
- 13 Q Do you recall being there, being at Ron's house,
- looking at this table, in the company of your sister and
- 15 your mother?
- 16 A I don't know if they were there or not, but I do
- 17 remember looking at the table.
- 18 Q I want to refer you to Exhibit No. 55, the second
- 19 page. Do you see that, ma'am?
- First off, this Exhibit No. 55, this is a
- 21 declaration that you prepared with the assistance of your
- 22 counsel. Is that right?
- 23 A Yes, sir.
- Q And you signed the document on page 7?
- 25 A Yes, sir.

- 1 Q And you understood that you were signing it under
- 2 the penalty of perjury?
- 3 A Yes, sir.
- 4 Q And as a CPA, you understand what that means,
- 5 right?
- 6 A Yes, sir.
- 7 Q The penalty of perjury?
- 8 A Yes.
- 9 Q I want to refer you to page number 2.
- 10 A Okay.
- 11 Q And I'm referring you specifically to the third
- 12 full paragraph. Do you see that, ma'am? The one that
- 13 begins "Shortly"?
- 14 A Yes, sir.
- 15 Q It says "Shortly thereafter, I received a form in
- the mail from the FCC, Form 800A."
- 17 A Mm-hmm.
- 18 Q Do you see that, ma'am?
- 19 A Yes, sir.
- 20 Q Now, I believe it was your testimony that
- 21 Attachment A was the 800A. Is that correct?
- 22 A I got a form -- I got Attachment A, but it was
- 23 blank.
- Q Okay.
- A But, yes, that is the one I got in the mail.

- 1 Q And the Attachment A that you received had your
- 2 name on it, Jennifer Hill?
- 3 A Yes, sir.
- 4 Q And it was addressed to you at 4312 Gus Thomasson
- 5 Road, Apartment 721?
- 6 A Yes, sir.
- 7 Q And you said you threw it away?
- 8 A Yes.
- 9 Q Can you explain to the Court how page 9 of Exhibit
- 10 No. 55 came to be in the record?
- 11 A Yes. I told you that before, that my Uncle Ronald
- brought this to my father for me to sign, the filled out
- one.
- 14 Q Well, if you threw it away, how did he get it
- 15 back?
- 16 A I don't know. But I know I threw it away.
- 17 Q Your uncle doesn't have access to your mailbox at
- 18 4312 Gus Thomasson Road, Apartment 721, does he?
- 19 A No, sir.
- 20 Q Did you give a copy of the Form 800A to your Uncle
- 21 Ronald before you threw it away?
- 22 A I don't believe I did. No, sir. I don't believe
- 23 I did.
- Q So you recall getting the Form 800A and receiving
- it in the mail in its original state. Is that right?

- 1 A Yes, sir.
- 2 Q And you opened that letter and what did you do
- 3 with it after you opened it and found out what it was?
- 4 A Threw it in the trash.
- 5 Q You threw it in the trash.
- 6 A Yes.
- 7 Q And you didn't take it out of the trash?
- 8 A No.
- 9 Q Okay. And did it say anywhere on the 800A that
- 10 you threw away that there was a carbon copy being sent to
- 11 anyone else?
- 12 A No, sir. I don't believe so.
- Okay. I'll ask you again, ma'am, if you threw the
- 14 800A in the trash, do you have any explanation on how page 9
- of Exhibit 55 came to be?
- 16 A No, sir.
- 17 Q Is it possible, ma'am, that you gave the 800A to
- 18 your uncle?
- 19 A No, I don't believe so because my mother called me
- 20 the next day and told me that Uncle Ron and Aunt Pat were
- 21 looking for these forms and I told her too bad, I'd thrown
- 22 it away.
- 23 Q And did your mother give you another copy of one,
- 24 an 800A?
- 25 A The only other copy I remember receiving is this

- one right here that's filled out and it came from Uncle
- 2 Ronald to my father, Jim Sumpter, with the instructions for
- 3 me to sign it and I told my dad I was not going to sign it
- 4 under advisement from my colleague at work.
- Okay. Now, let's go through that just a minute,
- 6 please. Did you see your Uncle Ronald give that to your
- 7 dad?
- 8 A No, sir. That was what my father told me.
- 9 Q My question to you, ma'am, was did you see him.
- 10 A Okay. I'm sorry. No, sir. I did not see.
- 11 I'm sorry.
- 12 Q You received it from your father. Is that right?
- 13 A Yes, sir.
- 14 Q And when you received it from your father, it had
- 15 this handwriting on it.
- 16 A Yes, sir.
- 17 Q And you received that from your father some time
- 18 after November 17, 1997, as is set forth on page 9 of
- 19 Exhibit 55. Is that correct?
- 20 A Yes, sir.
- 21 Q And you believe that the document that you got in
- 22 the mail that you threw away was about that same date,
- 23 11/17/1997.
- 24 A Yes, sir. I do.
- Now, before you got this document 11/97, had you

- 1 received any other documents pertaining to this license
- 2 that's in question here?
- A Before I got this document, I had gotten the Net
- 4 Wave order to show cause, the Net Wave petition.
- 5 Q Had you received any documents about a radio
- 6 station of any sort?
- 7 A I believe I got a card.
- 8 Q Okay. And let's -- that's on Exhibit 19, ma'am,
- 9 the big binder, page 451?
- Do you remember when you received one of those
- 11 cards?
- 12 A No, sir.
- 13 Q But you do believe it was prior to receiving this
- 14 Form 800A in 11/1997?
- 15 A Yes, sir.
- 16 Q Was this card that you received in the mail the
- 17 very first document that ever came to your attention about
- 18 this license?
- 19 A Yes, sir. I believe so.
- 20 Q What did you do when you got that card?
- 21 A I think I took the card and gave it to my mother
- 22 to pass on to my Aunt Pat.
- Q Well, did you know that there was a license out
- there that had been applied for in your name?
- 25 A I don't know what I knew.

- 1 Q Well, did you ask your mother why am I getting the
- 2 card?
- 3 A No.
- 4 Q Did you pick up the phone and ask Aunt Pat why do
- 5 I have a card?
- 6 A No, sir. I did not.
- 7 Q Did you pick up the phone and ask your Uncle
- 8 Ronald why do I have a card?
- 9 A No, sir. I did not.
- 10 Q You understood that the card was coming from the
- 11 FCC?
- 12 A Yes, sir.
- 13 Q You understood that it pertained to your license
- 14 application?
- 15 A I don't know that I actually read the card, I just
- 16 saw FCC and I think I passed it on.
- 17 Q And when you saw that card that said FCC on it or
- pertained to FCC, it didn't cause you any concern, you just
- 19 passed it on to your mom, right?
- 20 A Yes.
- 21 Q Did you receive any other mail about having a
- 22 radio license?
- 23 A I don't know. I don't remember.
- Q Do you remember when you received the card?
- A I think it was in '96 some time, but I can't tell

- 1 you exactly when.
- 2 Q Did you ever receive any other types of mail from
- 3 other people about radio stuff?
- 4 A I don't remember.
- Well, let me show you what's the next page,
- 6 Exhibit 452 --
- JUDGE STEINBERG: Page 452.
- 8 MR. ROMNEY: I'm sorry, page 452.
- 9 BY MR. ROMNEY:
- 10 Q Did you ever receive an environment with a
- 11 postdate of September 9, 1996 from Business Radio Licensing
- 12 in Laguna Hills, California?
- 13 A Sir, I just don't remember.
- 14 Q Okay. Let me ask you to turn to page 454. Did
- you receive any piece of correspondence that looked like
- 16 that?
- 17 A I don't remember.
- 18 MR. ROMNEY: Request permission to approach,
- 19 Your Honor.
- JUDGE STEINBERG: Go ahead.
- MR. ROMNEY: Your Honor, I request that this be
- 22 marked as -- what are we calling that -- RB/PB Exhibit 4 for
- 23 identification.
- JUDGE STEINBERG: Okay. We have a one-page
- document -- well, there's an envelope within the envelope.

1	MR. ROMNEI: 168, SII.
2	JUDGE STEINBERG: Okay. We have an envelope and
3	the envelope appears to be
4	This is the original on page 452?
5	MR. ROMNEY: That's my understanding, sir.
6	JUDGE STEINBERG: Okay. The original on page 452
7	and it's a plain old business envelope with a window in it
8	and return address Business Radio Licensing and the date of
9	the postage meter September 9, 1996. And it's a one-page
10	letter starting "Dear Licensee" and it appears to be
11	addressed to Ms. Hill at 4312 Gus Thomasson Road and then
12	inside the large envelope was like a legal size return
13	envelope addressed to Business Radio Licensing, so I'm going
14	to call it a three-page exhibit, the letter from Business
15	Radio Licensing, and it's identified as RB/PB Exhibit 4.
16	(The document referred to was
17	marked for identification as
18	RB/PB Exhibit No. 4.)
19	JUDGE STEINBERG: And what I'd like Mr. Romney to
20	do as one of his little chores will be to make copies of
21	that for the reporter, two for the reporter and one for
22	everybody else, and you can do that over the weekend, if you
23	want.
24	MR. ROMNEY: Thank you.
25	(Pause.)

- JUDGE STEINBERG: Let me also note for the record
- that the letter looks like page 454 of our Exhibit No. 19,
- 3 except page 454 only reproduces about half the letter. The
- 4 original is on 14-inch paper.
- 5 And RB/PB Exhibit 4 has been put in front of
- 6 Ms. Hill.
- 7 MR. ROMNEY: Thank you.
- BY MR. ROMNEY:
- 9 Q Ms. Hill, you have in front of you what's been
- 10 marked for identification as RB/PB, that stands for Ron
- 11 Brasher/Patricia Brasher, Exhibit No. 4.
- Do you recall receiving that letter and
- 13 environment in your mail?
- 14 A No, I don't recall.
- 15 Q Do you recall receiving that and passing it on to
- 16 your mother?
- 17 A I really don't remember.
- 18 Q You just don't remember one way or the other?
- 19 A I don't remember one way or the other.
- 20 Q The bottom of the letter, it's a long legal-size
- 21 piece of paper, is that your name and address?
- 22 A Yes, sir.
- 23 Q And that's your married name?
- 24 A Yes, sir.
- 25 Q And that's your correct address at the time in

- 1 1996?
- 2 A Yes, sir.
- Okay. Is it your testimony, ma'am, that you just
- 4 don't remember whether or not you received that letter?
- 5 A That's correct.
- 6 Q Now, if that letter was given to your uncle, is
- 7 there any other way it could have gotten to your uncle other
- 8 than through you to your mother or your dad?
- 9 A If it came to me, that's the only way it could
- 10 have gotten to him.
- 11 Q And, again, I'll ask you just to make sure, you
- don't have any reason to believe that your uncle had access
- 13 to your mailbox?
- 14 A No, sir. I do not.
- 15 Q Okay. Did the receipt of the card, ma'am, page
- 16 451 of Exhibit 19, did that not set off any bells in your
- head about, hey, there's a license out there for me with
- 18 FCC?
- 19 A Like I said before, I thought there was a license
- in my name, I thought Ronald was having them transferred to
- 21 him. I never thought that license was ever going to be left
- in my name. So, no, it didn't set off any bells because
- I thought this was what he had done before.
- Q Well, since the time that -- let's take you back
- in your mind to the day you got one of these cards, either

- the yellow or the green card.
- 2 A Yes, sir.
- 3 Q That had to be some time when, 1996? Is that the
- 4 best of your recollection?
- 5 A I assume so. I don't really remember.
- Q And by your recollection, as you've stated to the
- 7 Court today, the last thing you knew about any sort of a
- 8 license was back in 1990 or '91?
- 9 A Early '90s. I can't be sure what year.
- 10 Q Had you had anything from the FCC in all those
- 11 other years?
- 12 A Sir, I don't know.
- 13 Q Now, taking you back to this first license that
- 14 you believe you did in the early '90s, was that done in your
- 15 name, Jennifer Sumpter?
- 16 A I believe so.
- 17 Q And did you think you were doing anything wrong?
- 18 A No.
- 19 Q Did you think there was anything illegal about
- 20 that?
- 21 A No.
- 22 Q Did anybody tell you that this was wrong and don't
- tell anybody that we're doing this?
- 24 A No.
- Q Uncle Ron didn't say I'm applying for this in your

- name, but it's really for me and don't tell anybody because
- this is hiding something from the FCC?
- 3 A No, he didn't say it like that.
- 4 Q Okay. Please turn to Exhibit 19 that's in front
- of you, page 448. Do you see that signature, ma'am?
- 6 A Yes, sir.
- 7 Q And that is your signature?
- 8 A Yes, sir.
- 9 Q Now, you signed that on or about -- is that
- January 28, 1998 or is that April? Is that a four or a one?
- 11 A That's a one.
- 12 Q Okay. And you recall -- as you sit here today,
- you recall physically sitting down somewhere and signing
- 14 that document, right?
- 15 A Yes, sir. I do.
- 16 Q Where were you when you signed it?
- 17 A I believe I was at my father's office, accounting
- 18 office.
- 19 Q And that's your date?
- 20 A No, sir. That's not my handwriting. I believe
- that's my father's handwriting.
- MR. KNOWLES-KELLETT: Can we stipulate that that's
- Exhibit 55, page 14, as well, so the record is clear that
- 24 it's the same testimony? We're looking at two copies of the
- 25 same thing.

- 1 MR. ROMNEY: I have no problems with that,
- 2 Your Honor, if that would make it clearer for the record.
- BY MR. ROMNEY:
- 4 Q Ma'am, would you assure yourself that that's
- 5 correct? If you would turn, please, to Exhibit 55, page 14?
- 6 A 55, 14?
- 7 O Yes, ma'am.
- 8 A Okay.
- 9 Q That is the same document, as you understand it at
- 10 least?
- 11 A Yes.
- 12 Q Okay. And you believe that's your father's
- 13 handwriting on the date?
- 14 A Yes, sir.
- 15 Q Do you know who filled out the typewritten
- 16 portions that were typed up on this?
- 17 A I don't know for certain, no.
- 18 Q Was the typewriting on there when you signed the
- 19 document?
- 20 A Yes, sir.
- 21 O Who was present when you signed this document?
- 22 A I think just my father. I don't know for sure.
- 23 I don't remember.
- Q Was Melissa present?
- 25 A I don't remember.

- 1 Q Do you recall signing any documents for the FCC in
- 2 the presence of Melissa?
- 3 A I don't think so.
- 4 Q Was your mom present when you signed page 14 of
- 5 Exhibit 55?
- 6 A I don't remember.
- 7 Q Back when you were in college, you had a mobile
- 8 radio in your car. Is that right?
- 9 A Yes, sir.
- 10 Q Now, I believe you were asked a question by
- 11 Mr. Knowles-Kellett from the FCC, but I think he used the
- word phone. Did you consider that a phone or a radio?
- 13 A Well, it was a two-way radio, but I called it a
- 14 phone, but --
- 15 Q Did it have a phone handle on it?
- 16 A Yes. You picked it up like a phone, I think. And
- you had a little button you had to press, it was inside the
- 18 phone, to talk.
- 19 Q And you had that in your car at least until 1994?
- 20 A No, sir. I had that in my car until 1992.
- 21 Q '92?
- A Mm-hmm.
- 23 Q And you graduated in '94.
- 24 A Yes, sir.
- Q Did you have a license to operate that phone?

- 1 A I don't think so.
- 2 Q Do you know if your mom had a license for you to
- 3 have that phone in the car?
- 4 A I don't know.
- 5 O You don't know?
- 6 A No, I don't.
- 7 Q Do you know how many licenses with the FCC your
- 8 mom has ever held?
- 9 A No, sir. I don't know that.
- 10 Q Have you ever asked her?
- 11 A No, sir.
- 12 Q Okay. Has she told you that she had a license for
- 13 that phone in your car?
- 14 A No, sir. We didn't discuss that kind of stuff.
- 15 Q Did your mom ever tell you she had a license
- 16 before that?
- 17 A No, sir.
- 18 Q You drove that car until '92?
- 19 A Yes, sir.
- 20 Q Then what happened to the car?
- 21 A We bought me another car and that red car -- it
- 22 was a red Nissan, '97 Nissan, went to my younger sister so
- she could drive it throughout the rest of her years in high
- 24 school.
- 25 Q Benefits of being the oldest child, you get a new

- 1 car?
- 2 A Yes. Yes, sir.
- 3 Q Did that phone stay in that car?
- 4 A No. sir.
- 5 Q Did it come out when it went to Melissa?
- 6 A Yes. Well, they had -- this was the plan -- can
- 7 I explain it?
- 8 O Sure.
- 9 A I had switched cars for the day with my Aunt Sue,
- 10 Sue Lutz, who worked for DLB, and she took the red car up
- 11 to -- I drove her Toyota Camry and she took my little red
- 12 car up to work and they took the phone out because the plan
- was when I got my new car that summer they were going to put
- the phone back in -- or the two-way radio back in.
- 15 And so we took the red car up and they took the
- 16 radio out and Ronald kept it at his place of business, okay?
- 17 And then when we bought the new car in August of '92, my dad
- decided he'd rather me just have a regular real cell phone,
- 19 so we went to Texas Cellular and they installed a cell phone
- 20 inside my Pontiac car. So we never got that radio back.
- 21 That stayed with Ronald.
- Q Okay. Now, when you had that red car, I mean, you
- used the phone, right?
- 24 A Yes, sir.
- 25 Q You'd use it to let your folks know that you were

- on the way home from school?
- 2 A I just used it for emergencies. I was told not to
- 3 abuse it because it was a family favor and Dad didn't want
- 4 me to abuse it, so I only used it if I had an emergency.
- 5 Q But you used it more than once, I take it.
- A Probably. I don't really remember.
- 7 Q And you were going to school clear over in
- 8 Arlington, you're coming from where, Mesquite?
- 9 A Mesquite. Yes, sir.
- 10 Q For the judge, that's what, 40 miles one way?
- 11 A Yes. About a 30-minute drive with no traffic.
- JUDGE STEINBERG: Did you commute every day?
- 13 THE WITNESS: Just about. Just about.
- 14 JUDGE STEINBERG: From home to school?
- 15 THE WITNESS: Yes, sir.
- 16 BY MR. ROMNEY:
- 17 Q Now, if you would turn, please, to page 449 on
- 18 Exhibit 19, ma'am?
- 19 (Pause.)
- THE WITNESS: What was the number?
- JUDGE STEINBERG: 49.
- MR. ROMNEY: It's a really bad number on the
- 23 bottom.
- 24 THE WITNESS: 49 or 449?
- MR. ROMNEY: 449 on Exhibit No. 19.

- JUDGE STEINBERG: Oh, 449. Okay.
- 2 MR. ROMNEY: I'm sorry.
- MR. KNOWLES-KELLETT: Exhibit 56.
- 4 MR. ROMNEY: Okay. Yes. Exhibit 56, ma'am, is
- 5 the same.
- 6 THE WITNESS: Okay.
- JUDGE STEINBERG: Okay. Give me a page on 56,
- 8 please.
- 9 MR. ROMNEY: It's the only page, Your Honor.
- JUDGE STEINBERG: Okay. That makes my job easier.
- MR. ROMNEY: In fact, it's got the 449 Bates stamp
- 12 on it.
- BY MR. ROMNEY:
- 14 Q Now, that is your signature on that Exhibit No.
- 15 56, ma'am?
- 16 A Yes, sir.
- 17 Q And you remember signing that document?
- 18 A Yes, sir.
- 19 Q And, in fact, it was basically a form document
- 20 that yourself and your mom and your dad and your sister
- 21 signed, right?
- 22 A Yes, sir.
- 23 Q There were some minor changes for your dad's and
- 24 yours?
- 25 A Yes. I believe he wrote his first and I copied it

- 1 or change it to reflect me.
- 2 Q And did you sign this on or about November 29,
- 3 1997?
- 4 A Yes, sir.
- 5 Q And the reason that you signed this is because of
- 6 the Net Wave petition?
- 7 A Yes, sir.
- 8 Q Now, let me ask you about that Net Wave petition.
- 9 That was pretty scary, wasn't it?
- 10 A Yes, sir.
- 11 Q You're licensed to practice accounting in the
- 12 state of Texas.
- 13 A Yes, sir. I am.
- 14 Q And you were fearful that you could perhaps lose
- 15 your CPA license, right?
- 16 A Yes, sir. I was.
- 17 Q If you lose your CPA license, what does that do
- 18 for all the hard work and career that you've built to date?
- 19 A Throws it in the toilet.
- 20 Q And that's certainly not a result you wanted to
- 21 have happen, was it?
- 22 A No, sir. It was not.
- 23 Q In fact, even today, that's still quite a touchy
- and emotional issue for you, is it not, ma'am?
- 25 A Yes, sir.

- 1 Q And when you saw your Net Wave petition, did you
- 2 talk about that with your folks?
- 3 A Yes, sir. I did.
- 4 Q Had they received one like it?
- 5 A Yes, sir. They had.
- Q Did your dad express concern about losing his CPA
- 7 license?
- 8 A Yes.
- 9 Q Your mother works at your dad's accounting office,
- 10 right?
- 11 A Yes.
- 12 Q If your dad were to lose his CPA license, both
- your folks would be out work, wouldn't they?
- 14 A Yes, sir.
- 15 Q You'd be out of work, your folks would be out of
- 16 work.
- 17 A Yes, sir.
- 18 Q Melissa has a nursing license, right?
- 19 A Yes, sir. She does.
- 20 Q Did she mention to you her fear of maybe perhaps
- 21 losing her nursing license?
- 22 A Not at that time. She had not graduated from
- 23 college yet and passed her RN.
- Q Since the time she got her RN, has she ever
- expressed to you concern that she had some danger of perhaps

- losing her license?
- 2 A She's never expressed the concern, but Dad's kind
- of brought that to her attention. She doesn't fully
- 4 understand everything we're involved in.
- Nonetheless, that's certainly not something that
- 6 you wanted to have happen to you?
- 7 A No. You're correct. I didn't want that to
- 8 happen.
- 9 Q And your dad certainly didn't want that to have
- 10 happen to him.
- 11 A Right.
- 12 Q Did you understand that there could be fines
- 13 levied against you?
- 14 A Yes, sir. I did.
- 15 Q How much of a fine did you think could possibly be
- 16 levied?
- 17 A I was thinking they said something to the tune of
- 18 \$85,000.
- 19 Q Did you have \$85,000 to give to somebody?
- 20 A No, sir. Still don't.
- 21 O Still don't?
- 22 A No.
- Q Does your dad?
- A No, sir. He does not.
- Q How about your mom?

- 1 A No, sir.
- 2 Q Nurses make a lot of money. I'm sure Melissa's
- 3 got that kind of cash.
- 4 A No, she doesn't, actually.
- 5 Q That was a grave concern, though, to you. And I'm
- 6 not trying to make light of this, ma'am, that is a concern
- 7 that you had.
- 8 A Yes, sir.
- 9 Q And, in fact, maybe even up until the time the
- judge told you today that there was nothing going against
- 11 you by the FCC today, when you took the stand this
- 12 afternoon, you still had that concern, didn't you?
- 13 A I still have that today, right now.
- 14 Q And you're still concerned that you could possibly
- 15 lose your CPA license and be fined.
- 16 A Yes, sir.
- 17 Q Did you ever have a concern that you could be sent
- 18 to jail?
- 19 A No, sir.
- 20 Q How about your dad? Did he ever say that to you?
- 21 A No. sir.
- 22 O Melissa?
- 23 A No, sir.
- Q Your mom?
- 25 A No, sir.

- 1 Q This was probably the worst single thing that's
- 2 happened to you in your life so far, isn't it?
- 3 A Yes, sir.
- 4 Q It scared you.
- 5 A Yes, sir.
- 6 Q By the time you sat down and wrote this letter,
- 7 Exhibit No. 56, all those concerns were going through your
- 8 mind, weren't they?
- 9 A Yes, sir.
- 10 Q Yet even at the time you wrote the letter, Exhibit
- No. 56, you didn't think that you had really done anything
- 12 wrong, had you?
- 13 A I didn't even think I had signed it, sir. I don't
- 14 know. At this point, yes, I had talked to Ronald and he had
- told me we hadn't done anything wrong.
- 16 Q And you certainly, ma'am, you never acted with any
- intent to try to deceive the FCC, did you?
- 18 A No, sir. I did not.
- 19 Q I'll put you back to Exhibit No. 54, ma'am, page
- 20 3. Did you ever ask your mother if she signed your name to
- 21 that document?
- 22 A No.
- 23 Q Did you ever ask your mother, ma'am, if she had
- 24 had conversations with your Uncle Ron and your Aunt Pat in
- June of 1996 about your family making applications for the

- 1 T-band radio system that DLB Enterprises wanted to use?
- 2 A We've all had family discussions on whether we
- discussed this back then and we all feel like we haven't, so
- 4 I guess, yes.
- Okay. But why don't you tell the Court about some
- of those family discussions.
- 7 A We just tried to go over it in our mind to make
- 8 sure that nobody remembers -- what everybody remembers and
- 9 we've tried to remember what was going on and Mom thinks
- 10 that she was out of town most of that summer with my dad's
- 11 elderly aunt that now lives with them. Because she was in
- the hospital that June and she's remembered this since the
- depositions and so she was just thinking she wasn't even in
- 14 town most of June of '96.
- 15 Q Before the deposition, you had a chance to sit
- 16 down with your mom and your dad and your sister Melissa and
- 17 the four of you talked about this for about four hours,
- 18 right?
- 19 A Yes, sir.
- 20 O Went over all the statements to make sure
- 21 everybody remembered everything?
- 22 A Yes, sir.
- 23 Q Your dad kind of led those conversations, did he?
- 24 A Yes, sir.
- Q Did you have that same kind of a meeting before

- 1 you came here to Washington, D.C. to testify?
- 2 A We've been tied up in a hotel room for a day and a
- 3 half. Yes, we've been talking about it. It's hard not to.
- 4 Q Pulled out all your documents?
- 5 A Yes, sir.
- 6 Q But there wasn't an attorney there, was there?
- 7 I don't want to ask you about preparations with an attorney.
- 8 A No. He's been calling on the phone.
- 9 O So the last day and a half, you and your dad and
- your mom and your sis have been kind of tied up at the hotel
- 11 here?
- 12 A Yes, sir.
- 13 Q You've had a chance to talk about this case?
- 14 A Yes, sir.
- 15 O You've had a chance to talk about all your
- recollections and look at all the documents you submitted?
- 17 A Yes, sir.
- 18 Q Did you get a chance to talk to anybody at the
- 19 FCC?
- 20 A Not really. We ran into Bill on the street last
- 21 night, but nothing other than that. It was kind of hi,
- 22 how's it going.
- 23 Q Have you reviewed some documents in preparation
- 24 for your testimony today?
- 25 A Yes, sir.